## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

VICTORIA L. FRAZIER,

Plaintiff,

v.

CIVIL NO. 3:11-cv-00497-JRS

EXPERIAN INFORMATION SOLUTIONS, INC.; TRANS UNION, LLC; AND LITTON LOAN SERVICING, L.P.;

Defendants.

## **JOINT REPORT OF RULE 26(F) PLANNING MEETING**

Counsel for Plaintiff and counsel for Defendants have conferred in accordance with Rule 26(f) of the Federal Rules of Civil Procedure and the Court's October 13, 2011, Order Setting Pretrial Conference (Dkt. #15). The parties submit the following report of their meeting.

- 1. The Parties discussed the nature and basis of their claims and defenses.
- 2. The Parties discussed the possibilities for prompt settlement and resolution of the case.
- 3. The Parties agreed to make initial disclosures as required by Rule 26 within fourteen (14) days after the Rule 16(b) Initial Pretrial Conference scheduled for November 17, 2011.
  - 4. The Parties agree that there is no need to conduct discovery in phases.
- 5. The Parties agree that there is no present need to otherwise modify the deadlines and limitations of discovery provided for by the Federal Rules of Civil Procedure or the Local Rules or this Court's form Pre-trial Scheduling Order.
- 6. Consent to Service by Electronic Means: The Parties agree that pursuant to Rule 5(b)(2)(E) and 6(d) of the Federal Rules of Civil Procedure any pleadings or other papers may be

served by sending such documents by email to the primary and/or secondary email addresses listed below (or any updated email address provided to Plaintiff's counsel and all counsel of record). The Parties also agree, upon request, to promptly (no later than the second business day after the day of service) provide the sending party with confirmation of receipt of the service by email. The format to be used for attachments to any email message shall be Microsoft Word (.doc) or Adobe Acrobat (.pdf). If an error or delayed delivery message is received by the sending party, that party shall promptly (within one business day of receipt of such message) notify the intended recipient of the message and serve the pleading or other papers by other authorized means.

# Respectfully submitted,

Grant E. Kronenberg Virginia Bar Number 65647 Attorney for Defendant Trans Union LLC Morris & Morris, PC 11 S. 12th Street, 5th Floor P.O. Box 30 Richmond, VA 23218 Telephone: (804) 344-6334

Facsimile: (804) 344-8359 gkronenberg@morrismorris.com

#### /s/

Leonard Anthony Bennett Virginia Bar Number 37523 Attorney for Plaintiff Consumer Litigation Assoc PC 12515 Warwick Blvd, Suite 100 Newport News, VA 23606 Telephone: (757) 930-3660

Facsimile: (757) 930-3662

lenbennett@cox.net

And

Kristi Cahoon Kelly Virginia Bar Number 72791 Attorney for Plaintiff Surovell Isaacs Petersen & Levy PLC 4010 University Dr., Suite 200 Fairfax, VA 22030

Telephone: (703) 277-9774 Facsimile: (703) 591-2149 kkelly@smillaw.com

iterry e similie

### /s/

David Neal Anthony Virginia Bar Number 31696 Attorney for Experian Troutman Sanders LLP Troutman Sanders Bldg. 1001 Haxall Point P.O. Box 1122 Richmond, VA 23219 Telephone: (804) 697-5410 Facsimile: (804) 698-5118

david.anthony@troutmansanders.com

## /s/

Ethan G. Ostroff
Virginia Bar Number 71610
Attorney for Litton
Troutman Sanders LLP
P.O. Box 61185
222 Central Park Ave., Suite 2000
Virginia Beach, VA 23462
Telephone: (757) 687-7541
Facsimile: (757) 687-1541
ethan.ostroff@troutmansanders.com

#### And

John C. Lynch Virginia Bar Number 39267 Attorney for Litton Troutman Sanders LLP P.O. Box 61185 222 Central Park Ave., Suite 2000 Virginia Beach, VA 23462 Tel: (757) 687-7765 Fax: (757) 687-1504

john.lynch@troutmansanders.com

DATED: November 16, 2011

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 16th day of November, 2011, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record registered to use the CM/ECF system in this action, as follows:

Leonard Anthony Bennett

lenbennett@cox.net

Consumer Litigation Assoc PC 12515 Warwick Blvd., Suite 100

Newport News, VA 23606

Tel: (757) 930-3660 Fax: (757) 930-3662

And

Kristi Cahoon Kelly kkelly@smillaw.com

Surovell Isaacs Petersen & Levy PLC 4010 University Dr., Suite 200

Fairfax, VA 22030 Tel: (703) 277-9774 Fax: (703) 591-2149 Counsel for Plaintiff

David Neal Anthony

david.anthony@troutmansanders.com

Troutman Sanders LLP Troutman Sanders Bldg. 1001 Haxall Point P.O. Box 1122

Richmond, VA 23219 Tel: (804) 697-5410 Fax: (804) 698-5118 Counsel for Defendant

**Experian Information Solutions, Inc.** 

Ethan G. Ostroff

ethan.ostroff@troutmansanders.com

Troutman Sanders LLP

P.O. Box 61185

222 Central Park Ave., Suite 2000

Virginia Beach, VA 23462

Tel: (757) 687-7541 Fax: (757) 687-1541

And

John C. Lynch

john.lynch@troutmansanders.com

Troutman Sanders LLP

P.O. Box 61185

222 Central Park Ave., Suite 2000

Virginia Beach, VA 23462

Tel: (757) 687-7765 Fax: (757) 687-1504 Counsel for Defendant Litton Loan Servicing, L.P.

I further certify that I will cause a copy of the foregoing Motion and corresponding NEF by electronic mail on the following non-filing user:

None.

/s/

Grant E. Kronenberg
Virginia Bar Number 65647
Attorney for Trans Union LLC
Morris & Morris, PC
11 S. 12th Street, 5th Floor
P.O. Box 30
Richmond, VA 23218

Phone: 804-344-6334 Fax: 804-344-8359

gkronenberg@morrismorris.com